

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-30034-MAP
)	
MICHAEL ALAN CROOKER)	

DEFENDANT'S MOTION FOR LEAVE TO FILE SENTENCING MEMORANDUM
ONE DAY LATE

Defendant, Michael Crooker, respectfully requests leave to file his sentencing memorandum on April 9, 2007, one business day later than the date previously established by the Court. As reasons for this motion, defendant through undersigned counsel states that the memorandum is substantially complete but requires additional research and review before filing. Counsel was confident that the necessary research and review could be accomplished by the end of business on April 6, 2007; counsel, however, has taken ill and is unable to complete the memorandum as ordered this day.

Counsel for the government, Assistant U.S. Attorney Kevin O'Regan, is on long-planned leave until April 9, 2007 and therefore could not be reached for assent to this Motion.

MICHAEL ALAN CROOKER
By his attorney,

/s/ Timothy G. Watkins
Timothy G. Watkins
B.B.O. # 567992
Federal Defender Office
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), as well as to United States Probation Officer Richard Rinaldi by electronic mail, on April 6, 2007.

/s/ Timothy G. Watkins